

SPECIAL 510(k): Device Modification
OIVD Review Memorandum (Decision Making Document is Attached)

To: THE FILE

RE: DOCUMENT NUMBER **k113768**

This 510(k) submission contains information/data on modifications made to the SUBMITTER'S own Class II, Class III or Class I devices requiring 510(k). The following items are present and acceptable (delete/add items as necessary):

1. The name and 510(k) number of the SUBMITTER'S previously cleared device. (For a preamendments device, a statement to this effect has been provided.) **k100322 TD-4277 Blood Glucose Monitoring System.**
2. Submitter's statement that the **INDICATION/INTENDED USE** of the modified device as described in its labeling **HAS NOT CHANGED** along with the proposed labeling which includes instructions for use, package labeling, and, if available, advertisements or promotional materials (labeling changes are permitted as long as they do not affect the intended use).
3. A description of the device **MODIFICATION(S)**, including clearly labeled diagrams, engineering drawings, photographs, user's and/or service manuals in sufficient detail to demonstrate that the **FUNDAMENTAL SCIENTIFIC TECHNOLOGY** of the modified device **has not changed**.
This change was for:
 - A. The name of the device has changed from "TD-4277 Blood Glucose Monitoring System" to "U-RIGHT TD-4280 Blood Glucose Monitoring System"
 - B. Addition of the speaking function. The speaking function required (1) a software change and (2) a labeling change
 - C. The physical appearance of the meter has slightly changed from a circular to a rectangle shape.
 - D. The weight of the meter (without batteries) has changed from 67.2 g to 48.8 g.
 - E. The data transmission method has changed from USB to RS-232 interface.
 - F. The memory capacity was reduced from 1,000 to 450 measurements.
 - G. The backlight function was removed from the device.
4. **Comparison Information** (similarities and differences) to applicant's legally marketed predicate device including, labeling, intended use, physical characteristics, and analytes.
5. A **Design Control Activities Summary** which includes:
 - a) Identification of Risk Analysis method(s) used to assess the impact of the modification on the device and its components, and the results of the analysis
 - b) Based on the Risk Analysis, an identification of the verification and/or validation activities required, including methods or tests used and acceptance criteria to be applied
 - c) A declaration of conformity with design controls. The declaration of conformity should include:
 - i) A statement signed by the individual responsible, that, as required by the risk analysis, all verification and validation activities were performed by the designated individual(s) and the results demonstrated that the predetermined acceptance criteria were met, and
 - ii) A statement signed by the individual responsible, that the manufacturing facility is in conformance with design control procedure requirements as specified in 21 CFR 820.30 and the records are available for review.
6. A **Truthful and Accurate Statement, a 510(k) Summary or Statement and the Indications for Use Enclosure (and Class III Summary for Class III devices).**

The labeling for this modified subject device has been reviewed to verify that the indication/intended use for the device is unaffected by the modification. In addition, the submitter's description of the particular modification(s) and the comparative information between the modified and unmodified devices demonstrate that the fundamental scientific technology has not changed. The submitter has provided the design control information as specified in The New 510(k) Paradigm and on this basis, I

recommend the device be determined substantially equivalent to the previously cleared (or their preamendment) device.

The U-RIGHT TD-4280 Blood Glucose Monitoring System is intended for single-patient use only. Disinfection efficacy studies were performed by an outside service to evaluate the virus elimination effectiveness of disinfecting wipes. Micro-Kill Plus disinfectant wipes (Medline, EPA Reg. No. 59894-10-37549) were validated demonstrating complete inactivation of duck hepatitis B virus on materials from the TD-4280 meter. The sponsor does not market a lancing device for use with the device. The sponsor performed robustness studies and demonstrated that there was no change in performance or in the external materials of the meter after 5,000 cleaning and disinfection cycles designed to simulate 5 years of single patient device use. Each robustness cycle consisted of one pre-clean wipe and one disinfection wipe. Labeling has been reviewed for adequate instructions in validated cleaning and disinfection procedures.